

Exhibit 1

To Declaration Of Nicholas Paul Granath
In Support Of
“Plaintiff’s Memorandum Of Law Opposing Defendant’s Motion For Summary Judgment.”

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DELTA PILOTS ASSOCIATION, Plaintiff, v. JOHN DOE, Defendant.	Civil Action No.: 1:14-cv-00225-AKH PLAINTIFF'S SEALED MOTION TO AMEND COMPLAINT TO ADD A NAMED DEFENDANT, PURSUANT TO RULES 15 & 21
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BY PERMISSION FROM THE COURT TO FILE UNDER SEAL, pursuant to Order on January 7, 2015 (Doc. 41, page 2), Plaintiff, the Delta Pilots Association (“DPA”), by and through its undersigned counsel, hereby moves the Court, at the United States Courthouse, 500 Pearl St., New York, New York 10007-1312, pursuant to Federal Rules of Civil Procedure 15 and 21, for an order granting leave to amend its Complaint to name in its caption an individual defendant, Russell C. Melvin, and to file the same, unsealed.

For its supporting grounds, this motion is based upon Plaintiff’s separately filed supporting memorandum of law, its supporting declaration and attachments thereto, the pleadings, and any hearing in this matter. A proposed order is separately submitted.

Dated: January 29, 2015
White Plains, NY

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By: /s/ Stanley J. Silverstone

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DELTA PILOTS ASSOCIATION, Plaintiff, v. JOHN DOE, Defendant.	Civil Action No.: 1:14-cv-00225-AKH MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF’S SEALED MOTION TO AMEND COMPLAINT TO ADD A NAMED DEFENDANT, PURSUANT TO RULES 15 & 21
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I) SUMMARY.

This Honorable Court allowed DPA to make a sealed motion to amend its “John Doe” Complaint to name a real person. Nearly a year’s worth of third-party subpoenas and investigation demonstrate more than a good faith basis to allege that Delta Pilot, Tennessee resident, and ALPA Committee member, Russell C. Melvin, did intentionally harm DPA in the manner alleged in the Complaint and in violation of the Computer Fraud and Abuse Act. No factors under Rules 15 or 21 warrant denial. Therefore, the Court should grant DPA leave to amend its original “John Doe” Complaint to add in the caption “Russell C. Melvin” as a named individual defendant and to thereafter file the amended complaint, unsealed, and proceed as a normal case.

II) FACTS.

By order issued on January 7, 2015 (Doc. No. 41) this Court denied DPA's motion to modify or vacate the outstanding protective order but did so "without prejudice to [a] motion to amend [the] Complaint." (*Id.*). The order expressly contemplated that DPA could amend its Complaint to "replace its 'John Doe' allegation with the name of a real person ... by proper motion in this court, under seal, ... pursuant to Rules 15 and 21 ..." (*Id.*, p. 2).

Prior to that Order, in the hearing on January 5, 2015, based upon the verbal consent of DPA's counsel, as reflected in the transcript (*see*, Doc. No. 42, Transcript at 10:17-19), the Court reopened this matter (Tr. 13:2). Hence, this case has been opened since January 5, 2015.

To give context to the Order allowing a sealed motion for leave to add a named party, the following observations were made by the Court on the record in the January 5 hearing:

- That "Delta Pilots will have to make a proper motion in this court, first reopening the case and second asking me to amend to name the proper party, which will be an amendment under Rule 15 or Rule 21 or both. If confidentiality is desired, whoever is John Doe will have to make a motion to impart confidentiality" (Tr. 10:2).
- That "[t]he motion will be made under seal to protect the confidentiality, subject to being held public by subsequent order." (Tr. 10:8).
- That "[t]hose papers will name the John Doe, because you will want to change the caption." (Tr. 12:23).

As indicated further herein below, DPA has obtained evidence through third-party

subpoenas, and its own investigation, that affirmatively link and implicate Russell C. Melvin in the facts alleged in the Complaint that, if proven, establish a knowing, intentional violation of CFAA. (Declaration by Nicholas Paul Granath, hereinafter “Granath” at ¶ 4).

III) ARGUMENT.

1) The Legal Standard To Amend Under Rules 15 and 21.

Federal Rule of Civil Procedure 15(a)(2) applies to this motion. It provides that “a party may amend its pleading only with the opposing party’s consent or the court’s leave.” The court “should freely give leave when justice so requires.” Fed. R. Civ. P. 15(a)(2); *Grullon v. City of New Haven*, 720 F.3d 133, 139 (2d Cir. 2013); *Aetna Casualty & Surety Co. v. Aniero Concrete Co.*, 404 F.3d 566, 603-04 (2d Cir. 2005); *Duling v. Gristede’s Operating Corp.*, 265 F.R.D. 91, 96 (S.D.N.Y. 2010) (citations omitted). Trial courts have been instructed that “this mandate is to be heeded.” *Foman v. Davis*, 371 U.S. 178, 182 (1962). Generally, amendments are favored because they “tend to facilitate a proper decision on the merits.” *Sokolski v. Trans Union Corp.*, 178 F.R.D. 393, 396 (E.D.N.Y. 1998).

The Second Circuit has indicated that Rule 15(a)(2) provides a permissive standard. It has stated that, “[t]his permissive standard is consistent with our strong preference for resolving disputes on the merits.” *Williams v. Citigroup Inc.*, 659 F.3d 208, 212-13 (2d Cir. 2011). Motions to amend should therefore be denied only for reasons of undue delay, bad faith or dilatory motive, undue prejudice to the non-moving

party, or futility. *Burch v. Pioneer Credit Recovery, Inc.*, 551 F.3d 122, 126 (2d Cir. 2008) (citing *Foman*, 371 U.S. at 182); *McCarthy v. Dun & Bradstreet Corp.*, 482 F.3d 184, 200 (2d Cir. 2007).

Where, as here, leave to amend is sought to change the complaint *only to add a party*, Rule 21 is applicable as well as Rule 15. “To the extent a proposed amendment would add new parties, the motion is technically governed by Rule 21, which provides that ‘the court may at any time, on just terms, add or drop a party,’ rather than Rule 15 (a).” *Duling v. Gristede’s Operating Corp.*, 265 F.R.D. 91, 96 (S.D.N.Y. 2010) (citations omitted). However, “‘the same standard of liberality’ applies under either Rule.” *Id.* at 96-97 (citations omitted); *Soler v. G & U, Inc.*, 86 F.R.D. 524, 528 (S.D.N.Y. 1980) (quoting *Fair Hous. Dev. Fund Corp. v. Burke*, 55 F.R.D. 414, 419 (E.D.N.Y. 1972)).

Thus, leave to amend a complaint to assert claims against additional defendants “should be denied *only* because of undue delay, bad faith, futility, or prejudice to the non-moving party, and the decision to grant or deny a motion to amend rests within the sound discretion of the district court.” *DeFazio v. Wallis*, No. 2006 U.S. Dist. LEXIS 95154, at *1 (E.D.N.Y. Dec. 9, 2006), citing *Aetna Cas. and Sur. Co. v. Aniero Concrete Co., Inc.*, 404 F.3d 566, 603-04 (2d Cir. 2005); *Zahra v. Town of Southold*, 48 F.3d 674, 685 (2d Cir. 1995).

Finally, Rule 21 grants the court broad discretion to permit the addition of a party at any stage in the litigation. *Sullivan v. West New York Res., Inc.*, 2003 U.S. Dist. LEXIS 6498 (E.D.N.Y. Mar. 5, 2003).

2) **There Is No Basis To Deny DPA Leave To Amend To Add Russell C. Melvin As A Named Party.**

a) **A Summary Of The Evidence Implicating Russell C. Melvin Demonstrates There Is No Bad Faith In Seeking Leave To Amend To Name Him As Defendant.**

The standard to amend to add a party under either Rule 15 or 21 is a liberal one, providing that the court “should freely give leave when justice so requires.” Fed. R. Civ. P. 15(a)(2).

Moreover, this Court has observed that on *this* motion DPA has no particular need to “demonstrate their evidence.” (“I don’t think there’s anything in the protective order that says they [plaintiffs] have to demonstrate their evidence.” Tr. 4:8).¹ Still, a concise review of the evidence implicating Russell C. Melvin is offered in order to satisfy the Court that there is no *bad* faith that warrants denial of DPA’s motion. Following below is a summary of evidence, not an exhaustive catalog of it, linking and implicating Russell C. Melvin to: i) disruption of DPA’s web site on Squarespace, as alleged in ¶¶ 31-43 of the Complaint; ii) the anonymous call made to Caplinger confessing details of the ‘hack,’ as alleged in ¶¶ 55-56; and iii) motive to harm DPA and possible involvement in a conspiracy:

i) **Evidence Linking Russell C. Melvin To The Disruption Of DPA’s Web Site Hosted On Squarespace:**

- There can be no dispute that in 2013 DPA hosted its web site, <http://delta->

¹ See also: “I don’t think I ordered that I have to review the facts. I don’t think there is any provision in the Federal Rules of Civil Procedure for a review by the Court before a lawsuit is instituted.” (Tr. 5:21).

pilots.org, through **Squarespace**. (Complaint, ¶¶ 23-27).

- Records subpoenaed from Squarespace show that starting on November 8, 2013, DPA's web site was 'hacked' or disrupted (in part) by being placed in **"trial mode"** and by the issuance of commands in the 'master files' that resulted in the **primary domain name being switched to another domain name** that, while owned by DPA, was not used – but that now pointed to files existing on another computer server maintained in Canada (ContactPrivacy.com, run by Tucows, Inc.) that was established by an anonymous party or parties. The substituted primary domain was "deltapilot.org". The disruption caused anyone viewing DPA's web site to see another site masquerading as DPA's site proclaiming that DPA had quit its lawful campaign to replace the incumbent union ALPA and had thrown in its support to the incumbent, a material representation that was false and damaging. (Granath Attachment (hereinafter "Att.") 1, Att. 2; Att. 3; Att. 4; Att. 5; Att. 6).
- Records subpoenaed from Squarespace show that a Squarespace **"trial account"** that was utilized in the attack was created at 7:18 p.m. EST, November 8, 2013, by an **"impersonator"** under the name "Tim-Caplinger" **using an email address of, "amp.chumbawumba@ausi.com."** (Granath Att. 7, at first page). One minute later, at 7:19 p.m. EST on November 8, a user linked the domain "Tim-Caplinger.squarespace.com" to an unused, DPA-owned domain, "deltapilot.org", and made it the primary domain – this was the start of the misdirection to a hostile web site. (Granath Att. 7).
- Publicly accessible Internet "message threads" **link the name of "Russell C. Melvin" with an email address of "amp.chumbawumba@gmail"**. (Granath Att. 8; Att. 9).
- Publically accessible Internet "WhoIs" registration files show that **Russell C. Melvin had his own personal account at Squarespace** in 2013 when DPA's site was hacked by an impersonator. (Granath Att. 10).
- An email to ALPA from an address used by Russell C. Melvin, "rcmelvin@mac.com" attached a letter from Melvin providing details of the hacking not publicly known and specifically admitting to involvement in the hacking as well as to calling Tim Caplinger in the wake of it.** The letter admitted the following: that Melvin had a "Squarespace Trial Account"; that Melvin's own content was "accessible to those viewing a DPA-owned domain name"; that this occurred around "November 9"; that this "lasted for approximately 18 hours"; that the "domain name settings" had been altered; that Melvin "for a short time" had "DPA membership credentials"; that Melvin "contacted TC [Tim Caplinger] personally ..."; that in the call to Caplinger,

Melvin “offered to cover any expense”; that Caplinger threatened criminal charges”. All these details are corroborated by other evidence. (Granath Att. 11).

ii) Evidence Linking Russell C. Melvin To Anonymous Phone Calls To DPA President Tim Caplinger Confessing The Hack:

- Records subpoenaed from Verizon show wireless phone number **“901 871-7877” as the “originating number” of the anonymous caller to Caplinger’s home** on November 15, 2013, when a male caller claimed to Caplinger to be responsible for the hacking. (Granath Att. 12).
- Records subpoenaed from AT&T show that the phone number **“901 871-7877” belongs to the address of 7050 Corsica Drive, Germantown, TN 38138.**² (Granath Att. 13).
- **Tennessee property records and a warranty deed that show Russell C. Melvin acquired the property** of 7050 Corsica Drive, Germantown, TN 38138 in 2012.³ (Granath Att. 14; Att. 15; Att. 16).

iii) Evidence Of Motive For The Attack On DPA By Russell C. Melvin And Of Possible Conspiracy.

- Russell C. Melvin joined DPA and then withdrew before the hacking, as DPA membership records show. (Granath Att. 17).
- ALPA records show Russell C. Melvin participating on ALPA committees in 2013. (Granath Att. 18; Att. 19).
- Pay records show that *at the time of the hacking, Russell C. Melvin received pay from ALPA* (“Flight Pay Loss”). This was for Melvin’s work on “P2P” which is known to be an anti-DPA committee. (Granath Att. 20; Att. 21)

² Additional evidence beside the address specifically links the phone number to Melvin. (e.g., 34-38).

³ That the address is Melvin’s is corroborated by evidence of the same address that Melvin gave to DPA when he became a DPA member.

b) The Amendment Is Not Futile.

In addition to the lack of bad faith, there is no basis to deny the motion on futility grounds.

A proposed amendment is futile if the proposed claim could not withstand a Rule 12(b)(6) motion to dismiss. *Lucente v. IBM Corp.*, 310 F.3d 243, 258 (2d Cir. 2002). In considering a Rule 12(b)(6) motion to dismiss, “[t]he issue is not whether a plaintiff will ultimately prevail but whether the claimant is entitled to offer evidence to support the claims.” *Todd v. Exxon Corp.*, 275 F.3d 191, 198 (2d Cir. 2001) (quoting *Scheuer v. Rhodes*, 416 U.S. 232, 236 (1974)). Further, the Court must “accept all of the plaintiff’s factual allegations in the complaint as true and draw inferences from those allegations in the light most favorable to the plaintiff.” *Starr v. Georgeson S’holder, Inc.*, 412 F.3d 103, 109 (2d Cir. 2005); *Desiderio v. Nat’l Ass’n of Sec. Dealers, Inc.*, 191 F.3d 198, 202 (2d Cir. 1999).

The same recitation of evidence above, herein showing no bad faith demonstrates support for the claims; hence there is no futility apparent.

c) There Has Been No Undue Delay.

In addition to the lack of bad faith or futility, there is no basis to deny the motion because of undue delay.

As the Second Circuit has repeatedly recognized, “[m]ere delay, absent a showing of bad faith or undue prejudice, does not provide a basis for a district court to deny the right to amend.” *State Teachers Retirement Board v. Fluor Corp.*, 654 F.2d 843, 856 (2d

Cir. 1981); *Parker v. Columbia Pictures Industries*, 204 F.3d 326, 339 (2d Cir. 2000); *Rotter v. Leahy*, 93 F. Supp. 2d 487, 497 (S.D.N.Y. 2000) (“Typically, the moving party’s delay, standing alone, is not sufficient reason to foreclose amendment).” Length of time, in of and itself, does not provide a basis to deny a motion to amend. *Daniels v. Loizzo*, 174 F.R.D. 295 (S.D.N.Y. 1997).

Here, the time it has taken to reveal Russell C. Melvin’s identity and connect Melvin to the hacking was due to the secretive nature of this computer crime, that Melvin sought to keep his involvement secret (e.g., by calling Caplinger but refusing to identify himself), ALPA’s refusal to disclose that Melvin had written to ALPA to admit his involvement, and the resulting fact that DPA had to proceed subpoena by subpoena to track down the culprit (and was not willing to name any party it suspected without sufficient evidence). Moreover, DPA is well within its statute of limitations period under CFAA.⁴

d) No Unfair Prejudice Results.

In addition to the lack of bad faith, futility, or delay, there is no basis to deny the motion because of unfair prejudice.

In determining whether leave to amend should be granted, among the “most important” issues to consider is prejudice to the opposing party. *AEP Energy Servs. Gas Holding Co. v. Bank of America, N.A.*, 626 F.3d 699, 725 (2d Cir. 2010) (internal quotations omitted). In analyzing prejudice, courts consider whether the amendment

⁴ The statute of limitations under CFAA is two years. 18 U.S.C. § 1030(g).

would: (1) require the opponent to “expend significant additional resources to conduct discovery and prepare for trial,” (2) significantly prolong the resolution of the action, or (3) “prevent the plaintiff from bringing a timely action in another jurisdiction.” *Monahan v. New York City Department of Corrections*, 214 F.3d 275, 284 (2d Cir. 2000). However, in general, “the adverse party’s burden of undertaking discovery, standing alone, does not suffice to warrant denial of a motion to amend a pleading.” *United States v. Continental Ill. Nat’l Bank & Trust of Chicago*, 889 F.2d 1248, 1255 (2d Cir. 1989).

Melvin cannot claim sufficient prejudice to defeat the motion. Although the question of whether an amendment is prejudicial is determined on a case-by-case basis, a common example of a prejudicial amendment is one that “raises a new legal theory that would require the gathering and analysis of facts not already considered by the [defendant, and] is offered shortly before or during trial.” *Johnson v. Oroweat Foods Co.*, 785 F.2d 503, 510 (4th Cir. 1986). A non-prejudicial amendment is one that merely adds an additional claim based on facts already pleaded. *See Davis v. Piper Aircraft Corp.*, 615 F.2d 606, 613 (4th Cir. 1980) (“Because defendant was from the outset made fully aware of the events giving rise to the action, an allowance of the amendment could not in any way prejudice the preparation of the defendant’s case.”).

Here, while Russell C. Melvin proved quite capable of corresponding with ALPA to admit his involvement, he has remained hidden to DPA. Only DPA has been prejudiced so far.

3) The Court Should Allow The Case To Proceed Normally After The Amended Complaint Is Filed, Unsealed.

There is a presumption in the law that “lawsuits are public events.” *Doe v. Frank*, 951 F.2d 320, 324 (11th Cir. 1992); *see also*, *Doe v. Del Rio*, 241 F.R.D. 154, 156 (S.D. N.Y. 2006). When, as here, a defendant’s identity is not known, a plaintiff may sue “Doe” and should then be allowed, as this Court has done, the opportunity through discovery to identify a named defendant. *Valentin v. Dinkins*, 121 F.3d 72, 75-76 (2d Cir. 1997) (pro se plaintiff should have been permitted to conduct discovery to reveal identity of the defendant); *see also*, *Munz v. Parr*, 758 F.2d 1254, 1257 (8th Cir. 1985) (error to dismiss claim merely because the defendant was unnamed; “Rather than dismissing the claim, the court should have ordered disclosure of the Officer Doe’s identity”); *Wakefield v. Thompson*, 177 F.3d 1160, 1163 (9th Cir. 1999) (error to dismiss unnamed defendants given the possibility that identity could be ascertained through discovery).

DPA has done so and its discovery has revealed that Russell C. Melvin is a proper defendant.

As this Court observed in a comment during the hearing on January 5 directed to ALPA’s counsel, “It is very hard to run a case under a John Doe. ... As I see it now, it’s not likely that you will be protected as to identity.” (Tr. 13:6). The law supports the Court’s observation. The Federal Rules of Civil Procedure requires that “the title of the complaint must name all the parties.” Rule 10(a). Hence, in general, once discovery reveals the name of a defendant there is no reason not to name the defendant.

In this case, the Court had entered a protective order on the occasion of DPA’s

motion to enforce a subpoena on ALPA that, "... compelled disclosure of John Doe's identity subject to Plaintiffs affirmation that it would keep the identity confidential *until I permit it to amend the caption of its case*. ... Plaintiff is required to move to re-open its case, and to move to amend the complaint pursuant to Rule 21." (Doc. 35, p. 2) [emphasis added]. Now, this Court has the basis to conclude that DPA has satisfied Rules 15 and 21 allowing such amendment. Hence, the protective order should no longer bar revelation of the parties to this matter in an unsealed, amended complaint, and this case should proceed normally.⁵

CONCLUSION.

DPA has demonstrated the legal and factual basis for this Court to grant it leave to amend its original Complaint to name Russell C. Melvin as a defendant. There is no reason not to file the same as the First Amended Complaint, unsealed. This case is ready to proceed normally. DPA respectfully asks the Court to so allow.

⁵ According to ALPA counsel's representation to this Court, as of January 5 at least, Russell C. Melvin had his own attorney. (Tr. 2:19 "He has his own counsel.").

Respectfully submitted,

On: January 29, 2015

By: /s/ Stanley J. Silverstone

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DELTA PILOTS ASSOCIATION,

Plaintiff,

v.

JOHN DOE,

Defendant.

Civil Action No.: 1:14-cv-00225-AKH

**DECLARATION OF
NICHOLAS PAUL GRANATH**

I, Nicholas Paul Granath, do declare as follows:

1. I am lead counsel of record for Plaintiff Delta Pilots Association in the above-captioned matter, along with Stanley J. Silverstone.
2. I make this Declaration of my own free will, based on my personal, first-hand knowledge, unless otherwise specifically indicated.
3. This Declaration is in support of “Plaintiff’s *Sealed Motion* To Amend Complaint To Add A Named Defendant, Pursuant To Rules 15 & 21.”
4. In the year following the Court’s January 29, 2014 order allowing “discovery upon third parties in order to identify defendant John Doe” (Doc. 5), plaintiff through counsel subpoenaed and obtained discovery from the following third parties: i) Squarespace, ii) Verizon, iii) AT&T, iv) Fiber Hub, v) Contact Privacy, vi) Peer 1, and vi) ALPA. In addition, counsel for plaintiff conducted its own investigation, for example, obtaining property records and other publicly available documents or information, and on June 3, 2014, retained a computer forensic expert, John J. Carney.
5. Attached and labeled as **Attachment 1** is a true and correct copy of a ‘screen shot’ taken by Tim Caplinger (who will so testify), on or about November 8, 2013, at the start of the hacking, showing a view of DPA’s web management files hosted by Squarespace and further showing a misdirection of the primary domain.
6. Attached and labeled as **Attachment 2** is a true and correct copy of a ‘screen shot’

taken by Tim Caplinger (who will so testify), on or about November 8, 2013, days after the hacking, showing that DPA's web site had been placed in "trial mode."

7. Attached and labeled as **Attachment 3** is a true and correct copy of another 'screen shot' taken by Tim Caplinger (who will so testify), on or about November 8, 2013, days after the hacking, showing that DPA's web site had been placed in "trial mode."
8. Attached and labeled as **Attachment 4** is a true and correct copy of an extract of documents provided by Squarespace in response to subpoena by DPA showing a 'chat' transcript dated November 10, 2013 at 2:59 a.m. in which a Squarespace "customer care" employee states: "Issue Summary: Not entirely sure what is happening here, but they definitely show a linked, managed domain called deltapilot.org."
9. Attached and labeled as **Attachment 5** is a true and correct copy of an extract of documents provided by Squarespace in response to subpoena by DPA showing a 'chat' transcript dated November 10, 2013 at 1:00 a.m. in which a Squarespace "customer care" employee states: "I'm going to escalate this case to a domain administrator to review."
10. Attached and labeled as **Attachment 6** is a true and correct copy of an extract of documents provided by Squarespace in response to subpoena by DPA showing a 'chat' transcript dated November 9, 2013 at 1:16 p.m. in which a Squarespace "customer care" employee reports that: "Issue: Customer owns deltapilotsassociation.org which points to Squarespace 5 and looks to be properly mapped. www.deltapilotsassociation.org is now pointing to a Squarespace 6 site that is owned by someone else. Customer believes that this was done intentionally in an attempt to damage the organization."
11. Attached and labeled as **Attachment 7** is a true and correct copy of an extract of documents provided by Squarespace in response to subpoena by DPA first showing that a Squarespace "trial account" that was utilized in the attack by an "impersonator" under the name "Tim-Caplinger" using an email address of, "amp.chumbawumba@ausi.com." (see second page of Att. 7, also marked at bottom-center "Index 141"); and second showing this trial account was created at 7:18 p.m. EST, November 8, 2013 (see third page, also marked at bottom-center "Index 142"); and third showing that one minute later, at 7:19 p.m. EST on November 8, a user linked the domain "Tim-Caplinger.squarespace.com" to an unused, DPA-owned domain "deltapilot.org" and made it the primary domain – this was the start of the misdirection to a 'clone' website (*Id.*).

12. Attached and labeled as **Attachment 8** is a true and correct copy of publicly accessible Internet “message threads” obtained by Tim Caplinger (who will so testify) from inside an Internet “newsgroup” called “Military.aviation.rec” that shows “Russell C. Melvin” with an email address of “amp.chumbawumba@gmail” as of February 11, 2008.
13. Attached and labeled as **Attachment 9** is a true and correct copy of publicly accessible Internet “message threads” obtained by Tim Caplinger (who will so testify) from a page on the web site “www.nnseek.com” that shows “author threads” depicting “Russell C. Melvin” with an email address of “amp.chumbawumba” in 2008 and that links the same email to “rec. aviation.Military”.
14. Attached and labeled as **Attachment 10** is a true and correct copy of publicly accessible Internet “WhoIs” registration report from <http://www.domaintools.com> obtained by DPA’s computer forensic expert (who will so testify) that shows Russell C. Melvin had his own personal account on Squarespace, Inc., registered January 2, 2013, with a domain status of “active.”
15. Attached and labeled as **Attachment 11** is a true and correct copy of the letter from Russell C. Melvin to ALPA, obtained by DPA from ALPA following the Court’s order to enforce, with conditions, DPA’s subpoena (Doc. 21); the letter was attached to an email “rcmelvin@mac.com” represented by ALPA to be from Russell C. Melvin.
16. Attached and labeled as **Attachment 12** is a true and correct copy of an extract of records subpoenaed by DPA from Verizon showing wireless phone number “901 871-7877” as the “originating number” of the anonymous caller to Caplinger’s home on November 15, 2013, when a male caller claimed to Caplinger to be responsible for the hacking (as Caplinger will also testify).
17. Attached and labeled as **Attachment 13** is a true and correct copy of an extract of records subpoenaed from AT&T by DPA showing that the phone number “901 871-7877” belongs to the address of 7050 Corsica Drive, Germantown, TN 38138.
18. Attached and labeled as **Attachment 14** is a true and correct copy of a property record card your Declarant obtained from a publicly accessible web page of the Shelby County, Tennessee Assessor of Property, which shows Russell C. Melvin at an address of 7050 Corsica Drive, Germantown, TN 38138 in 2013.
19. Attached and labeled as **Attachment 15** is a true and correct copy of a property record card your Declarant obtained from a publicly accessible web page of the

Shelby County, Tennessee Assessor of Property that shows Russell C. Melvin at an address of 7050 Corsica Drive, Germantown, TN 38138 and history.

20. Attached and labeled as **Attachment 16** is a true and correct copy of a Warranty Deed your Declarant obtained from a publicly accessible web page showing Russell C. Melvin as co-owner with “wife” of 7050 Corsica Drive, Germantown, TN 38138, recorded September 17, 2012.
21. Attached and labeled as **Attachment 17** is a true and correct copy of an extract of property records maintained by DPA (as Tim Caplinger is prepared to testify to) that shows Russell C. Melvin gave DPA an address of 7050 Corsica Drive, Germantown, TN 38138 when he joined DPA.
22. Attached and labeled as **Attachment 18** is a true and correct copy of an ALPA publication obtained by Tim Caplinger in 2013 (who is prepared to so testify) that lists “Russ Melvin – MEC Government Affairs,” an ALPA committee.
23. Attached and labeled as **Attachment 19** is a true and correct copy of an ALPA publication obtained by Tim Caplinger in 2013 (who is prepared to so testify) that lists “Russell Melvin” on ALPA’s “Government Affairs” committee.
24. Attached and labeled as **Attachment 20** is a true and correct copy of an extract from “Air Line Pilots Association ALPA Flight Pay Loss System 4th Qtr FPL Report 2/28/14” obtained by Tim Caplinger in 2013 (who is prepared to so testify) that shows Russell C. Melvin received 15 hours of pay from ALPA during the period from November 6-8, 2013 (the time of the hacking) while working on a committee (“P2P”) to which Melvin was not assigned, and whose mission was to combat DPA’s lawful campaign to represent DPA pilots.
25. Attached and labeled as **Attachment 21** is a true and correct copy of an extract from the Delta pilot schedule obtained by Tim Caplinger in 2013 (who is prepared to so testify) for Delta pilot Russell C. Melvin that shows Melvin’s pay status on November 8 and 9 (the time of the hacking) was attributed to “ALPA.”

Pursuant to 29 USC § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 28, 2015

By: /s/ Nicholas Paul Granath
Nicholas Paul Granath, Esq.

Stanley J. Silverstone
SEHAM, SEHAM, MELTZ & PETERSEN, LLP
445 Hamilton Avenue, Suite 1204
White Plains, New York 10601
(914) 997-1346
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DELTA PILOTS ASSOCIATION, Plaintiff, v. JOHN DOE, Defendant.	Civil Action No.: 1:14-cv-00225-AKH ORDER
--	---

This matter, having come before this Court on plaintiff's sealed motion to amend its original "John Doe" Complaint to add into the caption Russell C. Melvin as a named defendant, and to be allowed to file the amended Complaint, unsealed, the Court, having considered plaintiff's motion, the pleadings filed in this action, and the standards of Rules 15 and 21, grants the motion and therefore:

IT IS HEREBY ORDERED that plaintiff has leave to file, unsealed, an amended Complaint naming Russell C. Melvin as a party defendant and to amend the caption accordingly.

DATED: _____, 2015

By: _____
Hon. Alvin K. Hellerstein
United States District Judge

Attachment 1

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

Delta Pilots Association
You are Webmaster / Logout
Unlimited since August 24, 2010

Dashboard
Overview
Manage Comments
Manage Posts

Structure
Architecture
Website Settings
Custom Domain
URL Shortcuts

Members & Access
Member Accounts
Member Permissions
IP Access Filters

Data & Media
File Storage
Data Snapshots
Blog Importer
Change Log

Statistics
Traffic Overview
Referrers
Popular Content

Billing
Subscribers
Search Queries
Detailed Activity


Manage Domains


Link Domain

Add a Custom Domain to Your Squarespace Site

To add a domain you've already purchased, click "Link Domain" and follow the instructions for your registrar. If you are a Squarespace member on an annual or bi-annual plan, you are eligible for one free custom domain. Click "Register Free Domain" and we'll take care of the rest.

Domains ?





www.deltapilotsassociation.org (Primary Domain)





This domain is not pointing correctly to Squarespace. You must change your A record to point to Squarespace within your domain registrar's interface. [Click here for more information.](#)



Record Type: A Current Value: 50.63.202.9 Correct Value: 65.39.205.54

Recheck Status


deltapilot.org
MANAGED BY  


www.delta-pilots.org (Primary Domain)


deltapilotsassociation.net


deltapilotsassociation.com


Attachment 2

To Declaration of Nicholas Paul Granath

In support of

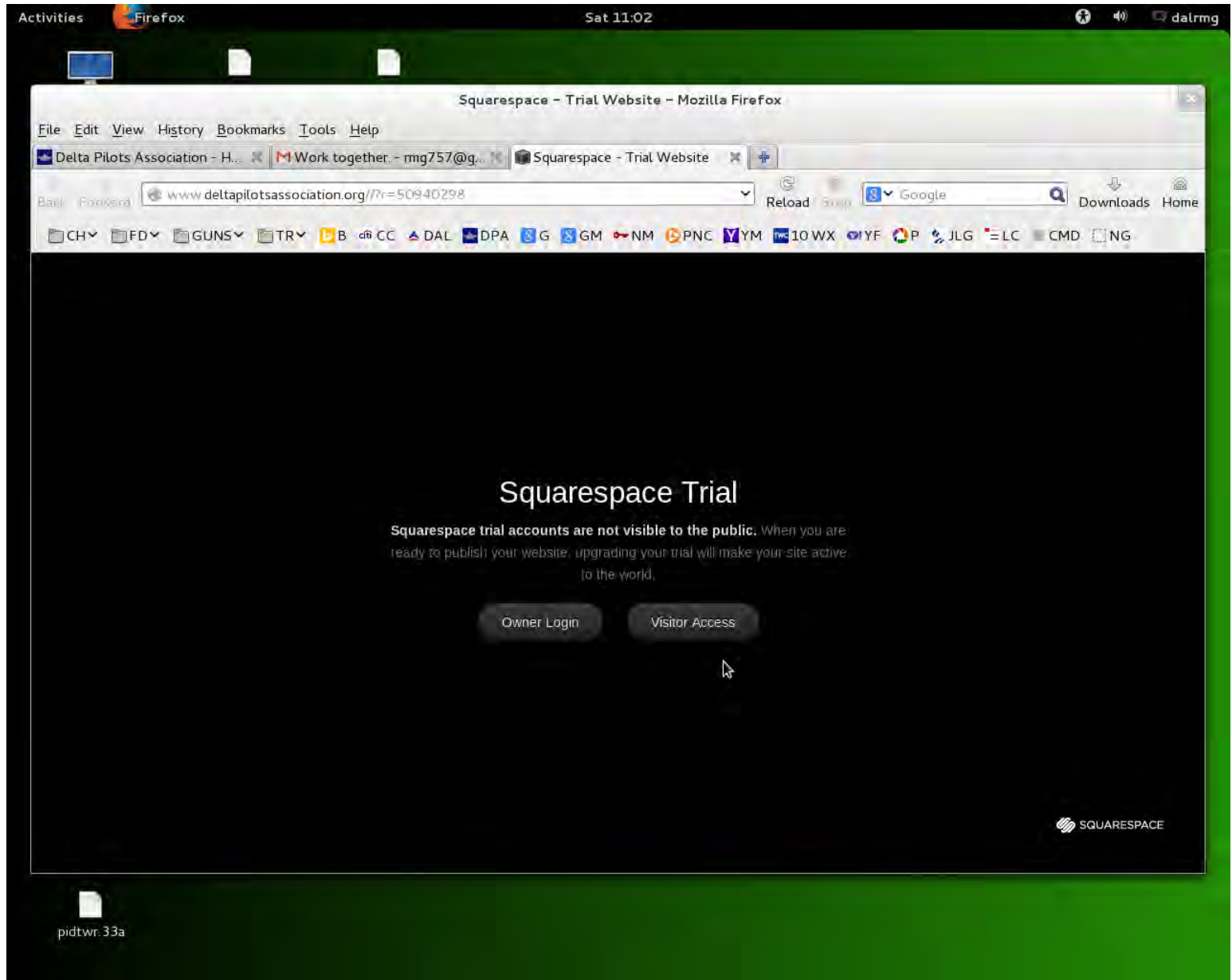
Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21



Attachment 3

To Declaration of Nicholas Paul Granath

In support of

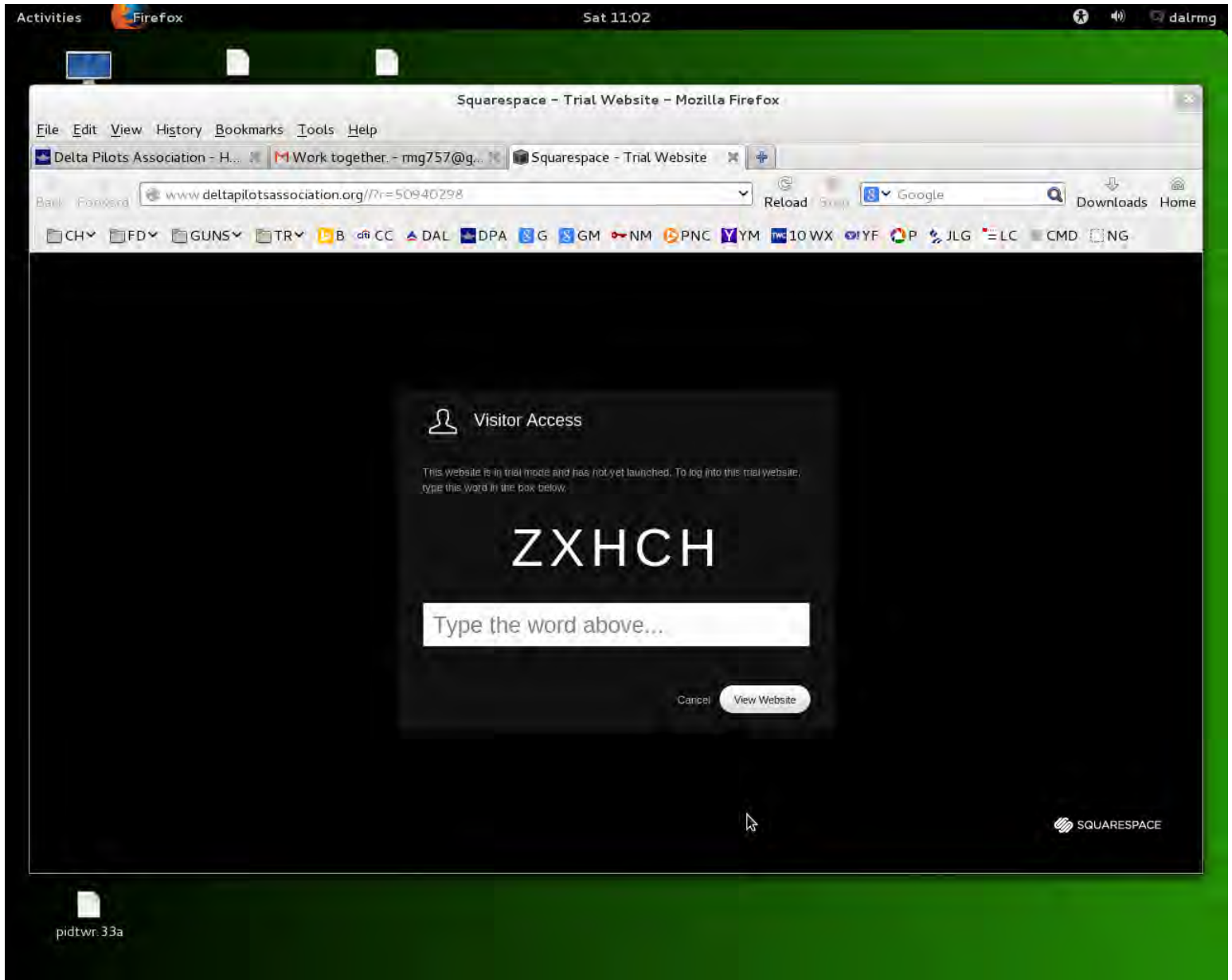
Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21



Attachment 4

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

2/6/2014

Desk.com Agent -- Rohit Giri

Nov 9th, 2013 at 11:34PM
 (3 months ago)
 Hijack Issue
To: (Empty)
From: media@delta-pilots.org
 Hi,

Somewhat, SquareSpace has added deltapilot.org to our domain list. This is a clone site DPA does not own. We need to remove it from our domain list immediately. Also, please research who has set up the trial squarespace account using deltapilot.org. This is our hacker. Please email us with results.

Tim Caplinger
 dpa@delta-pilots.org

Rick Eagan
 media@delta-pilots.org

Nov 10th, 2013 at 12:59AM 3 months ago
 Zoë Holmes
 Domain Name: deltapilots.org
 Date Registered: Not sure
 Issue Summary: Not entirely sure what is happening here, but they definitely show a linked, managed domain called deltapilot.org (see screenshot: <http://screencast.com/t/csS2Aalm>) that goes nowhere and they say they:

- 1) Did not register
- 2) Is the work of a hacker

I am wondering if sites can be automatically associated with accounts, or would someone with login access need to do this? Basically--do they have a hacker or maybe just a disgruntled ex member with a login and bad web skills?

Any ideas of what's happening would be appreciated!

Nov 10th, 2013 at 1:00AM
 (3 months ago)
 Zoë H.
To: media@delta-pilots.org
From: 'Zoë H.' <customercare@sqsp.me> (Squarespace Customer Care)
Reply-to: customercare@squarespace.com
 Hey there,

I'm going to escalate this case to a domain administrator to review.

You'll receive a reply to this case directly (#697937), as soon as possible.

We appreciate your patience, thanks!

Nov 10th, 2013 at 8:03AM 3 months ago
 Erin Sheridan
 Please Also see #697978

for additional customer comments.

Would like the deltapilot.org removed. As know where it come from. If we can do that?

Nov 10th, 2013 at 12:03PM 3 months ago
 Dan Schenker
 Also, #697815. They've submitted three tickets from two different people about the same issue.

<https://squarespace.desk.com/agent#>

1/2

Attachment 5

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

2/6/2014

Desk.com Agent -- Rohit Giri

Nov 9th, 2013 at 11:34PM

(3 months ago)

Hijack Issue

To: (Empty)

From: media@delta-pilots.org

Hi,

Somehow, SquareSpace has added deltapilot.org to our domain list. This is a clone site DPA does not own. We need to remove it from our domain list immediately. Also, please research who has set up the trial squarespace account using deltapilot.org. This is our hacker. Please email us with results.

Tim Caplinger

dpa@delta-pilots.org

Rick Eagan

media@delta-pilots.org

Nov 10th, 2013 at 12:59AM 3 months ago

Zoë Holmes

Domain Name: deltapilots.org

Date Registered: Not sure

Issue Summary: Not entirely sure what is happening here, but they definitely show a linked, managed domain called deltapilot.org (see screenshot: <http://screencast.com/t/csS2Aalm>) that goes nowhere and they say they:

1) Did not register

2) Is the work of a hacker

I am wondering if sites can be automatically associated with accounts, or would someone with login access need to do this? Basically--do they have a hacker or maybe just a disgruntled ex member with a login and bad web skills?

Any ideas of what's happening would be appreciated!

Nov 10th, 2013 at 1:00AM

(3 months ago)

Zoë H.

To: media@delta-pilots.org

From: 'Zoë H.' <customercare@sqsp.me> (Squarespace Customer Care)

Reply-to: customercare@squarespace.com

Hey there,

I'm going to escalate this case to a domain administrator to review.

You'll receive a reply to this case directly (#697937), as soon as possible.

We appreciate your patience, thanks!

Nov 10th, 2013 at 8:03AM 3 months ago

Erin Sheridan

Please Also see #697978

for additional customer comments.

Would like the deltapilot.org removed. As know where it come from. If we can do that?

Nov 10th, 2013 at 12:03PM 3 months ago

Dan Schenker

Also, #697815. They've submitted three tickets from two different people about the same issue.

<https://squarespace.desk.com/agent#>

1/2

Attachment 6

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

2/11/2014

Desk.com Agent -- Rohit Giri

DPA Mail

To: <customercare@squarespace.com>**From:** DPA Mail <dpa@delta-pilots.org>**Attachments:** image001.png

Notice the url below which we own but is redirecting to this trial site.

Tim Caplinger

DPA

From: 'Chris L.' [mailto:customercare@squarespace.com]**Sent:** Saturday, November 09, 2013 11:09 AM**To:** dpa@delta-pilots.org**Subject:** Re: HELP!

Nov 9th, 2013 at 12:53PM

(3 months ago)

DPA Mail

To: <customercare@squarespace.com>**From:** DPA Mail <dpa@delta-pilots.org>**Cc:** DPA Volunteer <jacseo@gmail.com>

Hi Go Daddy is hosting our domains. They indicate that all of our accounts look good and suggest that the hacker has opened a recent trial account at squarespace and has broken your code to take over the redirecting of www.deltapilotsassociation.org.

<http://deltapilotsassociation.org> appears to be going to our correct site, but it may be a clone. I can't tell.

Tim

From: 'Chris L.' [mailto:customercare@squarespace.com]**Sent:** Saturday, November 09, 2013 11:09 AM**To:** dpa@delta-pilots.org**Subject:** Re: HELP!

Nov 9th, 2013 at 12:56PM

(3 months ago)

Jarno V.

To: DPA Mail <dpa@delta-pilots.org>**From:** 'Jarno V.' <customercare@sqsq.me> (Squarespace Customer Care)**Reply-to:** customercare@squarespace.com

Hi Tim,

Thanks for bringing this to our attention. I'm going to take some extra time to review this issue more thoroughly.

I appreciate your patience on this!

Nov 9th, 2013 at 1:16PM 3 months ago

Jarno Veldhuis

*** Add to note/remove from response ***

Issue: Customer owns deltapilotsassociation.org which points to Squarespace 5 and looks to be properly mapped. www.deltapilotsassociation.org is now pointing to a Squarespace 6 site that is owned by someone else. Customer believes that this was done intentionally in an attempt to damage the organization.

Reproducible (y/n): y

<https://squarespace.desk.com/agent#>

4/6

Attachment 7

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

tim-caplinger.squarespace.com (527d7f5de46086d032d3515b)

users

+

No primary domain.



Tim Caplinger
amp.chumbawamba@ausi.com

DASHBOARD BILLING HISTORY DOMAINS EVENTS TAXONOMY TEMPLATE ARTIFACTS

BILLING STATUS

PLAN

PERIOD

AUTORENEW

NO ACCOUNT

NO ACCOUNT

NO ACCOUNT

BASIC

Created On: Nov 08, 2013, 7:18 PM

Next Billing Date: None

Last Payment: None

Linked to: Not Linked

Stripe ID:


COUPONS

Date	Amount	Link	Coupon Code	Coupon
No coupons found.				

tim-caplinger.squarespace.com (52707150e430990032d96180)

No primary domain.

users +

 **Tim Caplinger**
amp.chumbawamba@ausi.com

DASHBOARD BILLING HISTORY DOMAINS EVENTS TAXONOMY TEMPLATE ARTIFACTS

search text or users

USER SUPPORT NOTE SYSTEM

+ ADD NOTE

Date	Text	Type	User	Message
11/09/13 4:45:30 PM	Status changed from TRIAL to REMOVED	User	-	Customer/owner removal
11/09/13 1:03:25 PM	Impersonation as Tim Caplinger on tim-caplinger	Support	Shaun Horne	Impersonation as Tim Caplinger on tim-caplinger
11/09/13 1:03:25 PM	Impersonation as Tim Caplinger	Support	Shaun Horne	
11/09/13 12:44:24 PM	Impersonation as Tim Caplinger on tim-caplinger	Support	Jarno Veldhuis	Impersonation as Tim Caplinger on tim-caplinger
11/09/13 12:44:24 PM	Impersonation as Tim Caplinger	Support	Jarno Veldhuis	
11/09/13 12:40:14 PM	Impersonation as Tim Caplinger on tim-caplinger	Support	Jarno Veldhuis	Impersonation as Tim Caplinger on tim-caplinger
11/09/13 12:40:14 PM	Impersonation as Tim Caplinger	Support	Jarno Veldhuis	

tim-caplinger.squarespace.com (627a715d64b075cd32a5b13b)

users

+

No primary domain.



Tim Caplinger

amp.chumbawamba@ausi.com

DASHBOARD BILLING HISTORY DOMAINS EVENTS TAXONOMY TEMPLATE ARTIFACTS

11/09/13 - 4:45pm	domain_unlink_domain	2
11/09/13 - 4:45pm	domain_unlink_domain	
11/09/13 - 4:45pm	domain_unlink_domain	
11/09/13 - 4:45pm	engagement_view_statistics	
11/09/13 - 4:36pm	engagement_login	
11/09/13 - 1:03pm	domain_view_page	
11/08/13 - 7:55pm	engagement_meta_update	3
11/08/13 - 7:55pm	engagement_meta_update	
11/08/13 - 7:54pm	engagement_meta_update	
11/08/13 - 7:54pm	engagement_meta_update	
11/08/13 - 7:54pm	engagement_view_statistics	2
11/08/13 - 7:54pm	engagement_view_statistics	
11/08/13 - 7:54pm	engagement_view_statistics	
11/08/13 - 7:49pm	engagement_block_drop	
11/08/13 - 7:49pm	engagement_collection_add	
11/08/13 - 7:48pm	engagement_meta_update	3
11/08/13 - 7:48pm	engagement_meta_update	
11/08/13 - 7:48pm	engagement_meta_update	
11/08/13 - 7:44pm	engagement_meta_update	
11/08/13 - 7:43pm	engagement_meta_update	
11/08/13 - 7:43pm	engagement_meta_update	
11/08/13 - 7:20pm	domain_view_page	
11/08/13 - 7:20pm	engagement_checkout_view	
11/08/13 - 7:19pm	domain_make_primary_domain	
11/08/13 - 7:19pm	domain_link_domain	2
11/08/13 - 7:19pm	domain_link_domain	
11/08/13 - 7:19pm	domain_link_domain	
11/08/13 - 7:18pm	domain_view_page	
11/08/13 - 7:18pm	engagement_login	
11/08/13 - 7:18pm	lifecycle_trial	

TIMESTAMP		EVENT_NAME	IP_ADDRESS
2013-Nov-09	21:45:30 GMT	lifecycle_trial_expiration	None
2013-Nov-09	21:45:30 GMT	domain_unlink_domain	204.77.14.153
2013-Nov-09	21:45:30 GMT	domain_unlink_domain	204.77.14.153
2013-Nov-09	21:45:18 GMT	engagement_view_statistics	204.77.14.153
2013-Nov-09	21:36:23 GMT	engagement_login	204.77.14.153
2013-Nov-09	18:03:46 GMT	domain_view_page	74.131.26.226
2013-Nov-09	0:55:13 GMT	engagement_meta_update	192.168.1.214
2013-Nov-09	0:54:52 GMT	engagement_meta_update	192.168.1.157
2013-Nov-09	0:54:52 GMT	engagement_meta_update	192.168.1.157
2013-Nov-09	0:54:26 GMT	engagement_view_statistics	192.168.1.157
2013-Nov-09	0:54:20 GMT	engagement_view_statistics	192.168.1.157
2013-Nov-09	0:49:40 GMT	engagement_block_drop	192.168.1.165
2013-Nov-09	0:49:17 GMT	engagement_collection_add	192.168.1.165
2013-Nov-09	0:48:46 GMT	engagement_meta_update	192.168.1.165
2013-Nov-09	0:48:46 GMT	engagement_meta_update	192.168.1.165
2013-Nov-09	0:44:20 GMT	engagement_meta_update	192.168.1.150
2013-Nov-09	0:43:47 GMT	engagement_meta_update	192.168.1.157
2013-Nov-09	0:43:47 GMT	engagement_meta_update	192.168.1.157
2013-Nov-09	0:20:55 GMT	domain_view_page	192.168.1.213
2013-Nov-09	0:20:52 GMT	engagement_checkout_view	192.168.1.166
2013-Nov-09	0:19:47 GMT	domain_make_primary_domain	192.168.1.212
2013-Nov-09	0:19:42 GMT	domain_link_domain	192.168.1.212
2013-Nov-09	0:19:10 GMT	domain_link_domain	192.168.1.167
2013-Nov-09	0:18:56 GMT	domain_view_page	192.168.1.167
2013-Nov-09	0:18:37 GMT	engagement_login	192.168.1.167
2013-Nov-09	0:18:37 GMT	lifecycle_trial	192.168.1.167

Attachment 8

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

military.aviation.rec

.groups.com.ru

Major Russell Melvin, bad ass

Subject	Major Russell Melvin, bad ass
From	amp.chumbawamba@gmail.com
Date	Mon, 11 Feb 2008 16:30:39 -0800 PST
Newsgroups	rec.aviation.military

DECEMBER 30, 2007 - NEW YORK CITY, NY. Visitor's to New York City's Times Square witnessed a horrifying scene early this morning near TGI Friday's on the square. Russell Melvin of Austin, Texas, in town for the New Year's Eve celebration, disarmed and killed a violent career criminal attempting to rob a small group of tourists at gunpoint. The deceased was identified as Miguel Alonzo Aguila of Medellin, Columbia.

Melvin, speaking fluent Spanish, conversed briefly with the man after surrendering his wallet and other valuables. Witnesses say the gunman became extremely irritated and was acting irrationally when he lurched forward, grabbing Melvin's date, registered nurse Anna Michelle Pascal, also of Austin, Texas.

Witnesses say Melvin moved with blinding speed as he disarmed Aguila. In the process, Melvin delivered a crushing blow to the Aguila's trachea, crushing it. Additionally, during the takedown, Aguila's right arm was horribly dislocated at the shoulder. Witness Carlton Whitfield, an Air Force ROTC cadet at Rutgers University, described the scene as bizarre. "We were all scared for our lives. The guy appeared to be totally high on cocaine or alcohol. I was sure he was going to kill that woman. When that guy took him down, it happened so fast, it was like it was choreographed or something. The sound of that guy's shoulder being ripped from the socket literally made several of us vomit. It was the most bizarre thing I've ever seen but I'm grateful that guy was there to protect us."

Anthony Bandini, a community college instructor from Boston, described the aftermath as equally chilling. "As that guy laid there suffocating, Melvin's date was attempting to resuscitate him. Melvin ordered us to call 911 then knelt alongside him and said a Catholic prayer for the dying. When the guy died, Melvin field stripped the weapon and put the firing pin in his pocket. He gave it to police when they arrived a few minutes later."

Police arrived approximately three minutes after the call for help. NYPD watch supervisor Sgt. William Hamer indicated Aguila was found face down with his right arm was draped across his upper back. Augila's weapon was disassembled and resting on the small of his back. "It was a very disturbing sight, " said Hamer. "I've seen a lot of things on this job, but this is up there with the strangest among them."

Police report over a dozen of witnesses were questioned at the scene. Melvin and Pascal were transported to the local substation where they gave extensive written statements. After investigators reviewed several Times Square security cameras, both Texans were released without restrictions.

A copy of the police report indicates Melvin is a Major in the United States Air Force Reserves and a decorated Gulf War veteran. He is the President and Chief Executive Officer of a defense consulting company which provides tactical aerial reconnaissance to the United States Department of Defense and other military organizations. In the early 90's, Melvin spent three years on a deep insertion assignment in the former Soviet Union.

When questioned by media upon his release, Melvin dismissed the affair. "A bad guy left his house today looking for some booze and money. I'm sorry it turned out the way it did. Aguila was a career criminal. If he had been kept in confinement, he'd be alive today. I made every effort to reason with him but, ultimately, the enemy gets a vote on how things turn out. He voted wrong today. I'm sorry for his family and those that loved him. We should all say a prayer for him and his family."

Recent messages in this thread

Major Russell Melvin, bad ass	amp.chumbawamba@g...	12-Feb-2008 12:30 am
Re: Major Russell Melvin, bad ass	Dave Kearton <dke...	12-Feb-2008 12:42 am
Re: Major Russell Melvin, bad ass	Gernot Hassenpflug	12-Feb-2008 03:21 pm
Re: Major Russell Melvin, bad ass	amp.chumbawamba@g...	12-Feb-2008 03:56 pm
Re: Major Russell Melvin, bad ass	bigrig4u@gmail.com	12-Feb-2008 04:02 pm

Attachment 9

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21



Do you have a question? Post it now! No Registration Necessary. Now with pictures!

Start your post now by typing its title here, add details next »

Post your question

Threaded View



amp.chumbawamba

posted on
February 19,
2008, 4:07 pm

rate [this thread](#)

EXCELLENT
VERY GOOD
GOOD
FINE
BAD

Title Search with Liens

Official site for Title Search.
Find liens, judgments,
mortgages.



In search of an SEO Black Hat Ninja to rip the heart out of a defamatory blog being operated anonymously and protected by DMCA. Contact amp.chumbawamba ***at*** g***mail.com. Currently #1 search result for term on all [engines](#). \$.



Other Related Threads:



ladki

posted on
February 19,
2008, 10:22 pm

[Permalink](#)

Re: WANTED: SEO Black Hat Ninja

Hi all;

[Please visit my website](#) dedicated to the changing sweetness of our climate:

<http://cheeni.mechanic.googlepages.com>

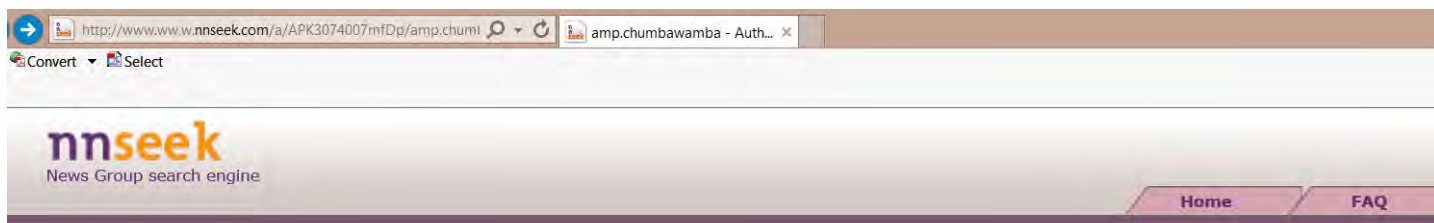
Thanks



3 ads related to wanted seo black hat ninja

1. [Wanted Seo Black Hat Ninja](#)
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[Ask.com/Answers](#)
2. [Find Wanted Seo black hat ninja](#)
Search for Wanted Seo black hat ninja. Find Great Results on Yahoo.com!
[search.yahoo.com](#)
3. [Find Wanted Seo black hat ninja](#)
Search for Wanted Seo black hat ninja. Find Great Results on Yahoo.com!
[search.yahoo.com](#)

Chitika | Opt out?



POPULAR GROUPS

[de.soc.politik.misc](#)
[de.sci.philosophie](#)
[de.talk.tagesgeschehen](#)
[de.etc.sprache.deutsch](#)
[de.admin.news.groups](#)

more...

Author: amp.chumbawamba
 Posts total: 6
 Threads total: 5

Author posting activity			
	Week	Month	3 Months
Threads	1	1	5
Posts	1	1	6

Author's most active groups	
Group	Authors' messages
rec.aviation.military	2
alt.internet.searchengines	1
soc.veterans	1
alt.military.retired	1
alt.religion.scientology	1

Author's most active threads

[Major Russell Melvin, bad ass](#)

Started amp.chumbawamba · Date: Feb 12, 2008 01:30 · Posts: 2 / 14 (amp.chumbawamba / total)

[WANTED: SEO Black Hat Ninja](#)

Started amp.chumbawamba · Date: Feb 19, 2008 17:07 · Posts: 1 / 2 (amp.chumbawamba / total)

[Major Russell Melvin, bad ass](#)

Started amp.chumbawamba · Date: Feb 12, 2008 01:29 · Posts: 1 / 1 (amp.chumbawamba / total)

[Major Russell Melvin, bad ass](#)

Started amp.chumbawamba · Date: Feb 12, 2008 01:30 · Posts: 1 / 1 (amp.chumbawamba / total)

[Russell C. Melvin](#)

Started nicu · Date: Mar 16, 2008 17:25 · Posts: 1 / 1 (amp.chumbawamba / total)

Most active threads started by author

[Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 01:30 · Posts: 14

[WANTED: SEO Black Hat Ninja](#)

Date: Feb 19, 2008 17:07 · Posts: 2

[Russell C. Melvin](#)

Date: Mar 16, 2008 17:25 · Posts: 1

[Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 01:30 · Posts: 1

[Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 01:29 · Posts: 1

Latest threads

[Russell C. Melvin](#)

Date: Mar 16, 2008 17:25 · Posts: 1

[WANTED: SEO Black Hat Ninja](#)

Date: Feb 19, 2008 17:07 · Posts: 2

[Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 01:30 · Posts: 14

[Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 01:30 · Posts: 1

[Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 01:29 · Posts: 1

Latest posts

[Russell C. Melvin](#)

Date: Mar 16, 2008 17:25

[WANTED: SEO Black Hat Ninja](#)

Date: Feb 19, 2008 17:07

[Re: Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 16:56

[Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 01:30

[Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 01:30

[Major Russell Melvin, bad ass](#)

Date: Feb 12, 2008 01:29

Attachment 10

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint



To Add A Named Defendant,

Pursuant To Rules 15 & 21

Russell C. Melvin
 7050 Corsica Drive
 Germantown, TN 38138
 Tel.: (901) 209-9359
 (901) 871-7877
 (616) 669-9359
 E-mail: Russrussell@russellmelvin.com
 admin@russellmelvin.com
 cpaige@airmota.org
 dbiw@mac.com

“Whois” listing for domain name listing russellmelvin.com shows SquareSpace, Inc. as the ISP. It also shows possible ownership by this John Doe of other domains:

Whois & Quick Stats

Registrant Org	Russell Melvin is associated with ~27 other domains	Reverse Whois
Registrar	GODADDY.COM, LLC	
Registrar Status	clientDeleteProhibited, clientRenewProhibited, clientTransferProhibited, clientUpdateProhibited	
Dates	Created on 2008-02-11 - Expires on 2016-02-11 - Updated on 2013-01-10	
Name Server(s)	NS23.DOMAINCONTROL.COM (has 37,249,777 domains) NS24.DOMAINCONTROL.COM (has 37,249,777 domains)	
IP Address	198.185.159.135 - 373,680 other sites hosted on this server	
IP Location	 - New York - New York City - Squarespace Inc.	
ASN	 AS53831 SQUARESPACE - Squarespace, Inc.,US (registered Jan 02, 2013)	
Domain Status	Registered And Active Website	
Whois History	38 records have been archived since 2008-02-12	
IP History	15 changes on 12 unique IP addresses over 6 years	
Registrar History	2 registrars	
Hosting	2 changes on 3 unique name servers	

Attachment 11

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

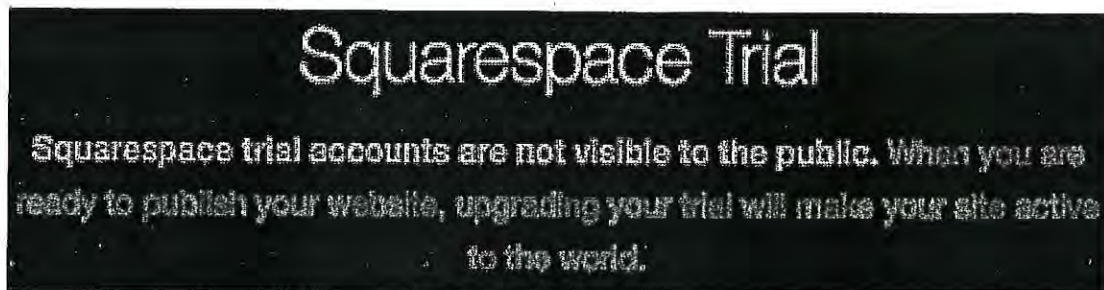
Pursuant To Rules 15 & 21

Colleagues,

I am writing to address the issue of DPA's most recent claim that their website was in some way redirected.

I have two website accounts. One is personal. One is for a business with which I am affiliated. Until recently, I had a third personal website account.

This third website account was in Trial Mode while I was choosing templates related to the subject matter and evaluating the product's ability to accept imported data from a similar product. The product has millions of account holders PRECISELY because of its ease of point-and-click use by non-savvy website builders. On this third website's platform, accounts must be purchased to go live and to be published. Because this third account had not been paid for, it was in Trial Mode and I had taken *no* action to publish it. This third web site account contained my private writings and thoughts of a personal nature—none of which were intended to be seen by anyone other than my family and myself using a password protected web page. Based on the product's explicit assurance, I had every reason to believe ALL user-generated content was private, invisible to anyone but the account owner and, in fact, digitally sealed off from the world while in trial mode. See the screen capture below:



While at home preparing for vacation, I learned the DPA website was alleged to have been "hacked." Subsequent to learning this, and in the normal course of my vacation time, I learned from a fellow pilot that my personal, unpublished website was mapping to a domain name owned and controlled by DPA. My private writings and thoughts of a personal nature were briefly accessible to those visiting a DPA owned domain

name, and who chose to enter a password on the web page presented to them. Once public, my data was subject to manipulation. I did not provide a password to *anyone*, including my family. My private thoughts were supposed to be completely sealed off from the world while in trial mode—and they weren't. My account was supposed to be secure and accessible only by me--but it wasn't. It is therefore unclear to me whether or not information in my account was added, changed, deleted, or downloaded by someone else. I don't know what other private data is in the public domain, and how or if it will be used. The lies—there's no other way to put it—lies being told by Tim Caplinger and the DPA are so far out of bounds it's difficult to put them in context as a person with a rational perspective. Caplinger is lying, and he KNOWS he is lying, because I told him the truth in good faith. These lies are intentionally inflicting tremendous emotional distress on my wife and me and, in my opinion, he's doing it to achieve a political objective.

Upon learning of the issue, I took immediate steps to protect the interests of all parties. I prevented further unauthorized access to my account or further publication of my private information by immediately shutting down the account. I did so within moments after I received the phone call. I reasoned that doing so would also stop visitors seeking DPA's website from finding mine. This was accomplished by early afternoon on Saturday, November 9. From what I can gather this mapping issue lasted for approximately 18 hours. It is now my understanding the domain name owner could have immediately altered the DPA domain name settings in order to stop the errant mapping. Why they chose not to take that action is a question that has not been answered to my satisfaction.

I opened the trial web-based personal journal account using a personally owned and properly registered laptop computer. The decision to open the account was mine, and mine alone. I neither solicited nor was offered any assistance or encouragement from any person or organization in opening in the account. There is a witness available to corroborate the facts surrounding the opening of this account. At no time did I rely on any person or organization for the creation, operation, or deletion of the account. During account creation, I logged on to the internet using my own properly registered subscription-based mobile WiFi service. The trial account contact email

provided was a personal address in routine use for over seven years. It would have been very easy to determine who opened the trial account, and that of course is inconsistent with the M.O. of a trained hacker or someone with malevolent intent. Others would describe my computer skill as "slightly above average" and "competent with package-based software like Microsoft Office." I have no knowledge of how to "hack" or how to unlawfully redirect a domain name. I use an Apple computer and have never had or been concerned about computer viruses. To be unequivocally clear, ALPA was not involved in any manner in the setting up or operation of my account, nor was it aware of any aspect of this incident until I transmitted this statement to their counsel.

At no time did I attempt to access DPA's domain name management account or their web site account, nor did I make any effort to knowingly interfere with their ability to run their website. I do not have nor have I ever possessed any knowledge of any computer credentials which would give me the ability to access accounts other than my own or those belonging to my family. When DPA was in its infancy, I was asked to submit an authorization card and I did so. Shortly thereafter I officially revoked the card using the NLRB proscribed format. For a short time I had DPA membership credentials to access the DPA website as an authorized end-user—but never as an administrator of any sort. When I revoked my membership, the DPA newsletter stopped arriving in my email inbox, I discarded those credentials, and I have no idea what they were. My last access or attempt to access the DPA website as an authorized end-user—and therefore in any capacity—was several years ago

In an effort to resolve this issue and make sure all facts were on the table for everyone, I contacted Tim Caplinger personally and discussed the matter. I made this contact even before I contacted ALPA to make it aware of this mapping issue. I had hoped that our discussion would lead to a man to man resolution of this issue. It did not. Instead, he threatened me with civil and criminal charges and attempted to say I was "confessing" something to him when, in fact, all I was doing was informing him of what I knew and expressing my regret that the mapping problem interfered with the operation of his website. He instructed me to write a confession letter with all technical details, to

post it online, and to mail him a certified copy. I told him that was not going to happen, because I didn't have anything to "confess" to, and I told him that meeting this demand would be akin to "professional suicide." During brief conversations on that Friday morning, I was so confident that I had not made any attempt to access the resources required to redirect a DPA domain name, I offered to cover any expenses incurred by him or his organization should I be found negligent in any way. I did NOT offer to "bribe" him in order to stop pursuing answers. In fact, I ended the conversation by giving him my solemn promise that we would be able to work together to ensure a full, complete, and amicable resolution to this issue. I told him I'd speak to my attorney and get back to him. I asked for patience as we worked through the issue.

So we are clear, I do not claim that either Caplinger or anyone associated with DPA intentionally compromised my website. By the same token, I never had access to the DPA domain name or website accounts and therefore could not have unilaterally redirected traffic from their website to my account, or otherwise interfered with operation of their website. Obviously I would have nothing to gain by mapping my personal website to DPA's domain name and compromising the privacy of my own data. Moreover, I would not know how to accomplish the result even if I wanted to, and further, I don't believe it can even be accomplished without administrative access to the DPA domain names and website. Finally, if I was interested in interfering with the DPA website, why would I shut down my site as soon as I became aware of the mapping problem? .

I regret this whole incident, but I particularly regret that for reasons that were not my fault, strangers may well have viewed my private thoughts. My recent journaling includes my personal thoughts on the unexpected death of both parents, concerns about my special needs child, and the stresses of working two jobs to provide for my family. ALPA, of course, had nothing whatsoever to do with any of this and I find it absurd that this problem has been converted into a political issue.

All data at my disposal suggests this was purely a technical issue—most likely an unforeseen confluence of otherwise innocuous technical

factors--between two sites hosted on the same software platform. It was resolved immediately upon discovery. I don't believe there is any fault to assign, however, the method by which my account was accessed without my knowledge or consent remains a mystery. To my understanding, neither party had the required access to unilaterally redirect a domain name to my private journal. I can say with confidence that I took NO action to damage the DPA domain name or website. I want to consider the matter closed and I am thankful that my confidentiality has so far been respected.

Respectfully submitted,

Attachment 12

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

===== Computer Search =====
Case #: 14109461 Target #: 813-960-8619
Requested Date Range : Nov 15 2013 11:00AM GMT - Nov 15 2013 6:00PM GMT
=====

Computer Search Report for Terminating calls.
Calls carried by other carriers should be confirmed with that carrier.
Originating numbers must be verified with all companies.

Originating Number	Terminating Number	Call Date	Connect Time	Call Duration	Time Source	Call Type
9018717877	8139608619	2013-11-15	14:01:59	0000:17	G	Carried by 0288
9018717877	8139608619	2013-11-15	14:01:59	0000:18	G	VZT Intra Group
9018717877	8139608619	2013-11-15	14:02:41	0037:14	G	Carried by 0288
9018717877	8139608619	2013-11-15	14:02:41	0037:16	G	VZT Intra Group
4079674700	8139608619	2013-11-15	15:36:56	0000:06	G	OPT2 ISDN PRI, ETS I PRI
4079674700	8139608619	2013-11-15	15:37:21	0000:06	G	VZT Intra Group
4079674700	8139608619	2013-11-15	15:37:22	0000:06	G	Carried by 0222
9018717877	8139608619	2013-11-15	15:51:20	0025:37	G	Carried by 0288
9018717877	8139608619	2013-11-15	15:51:20	0025:39	G	VZT Intra Group
9018717877	8139608619	2013-11-15	16:36:20	0001:35	G	Carried by 0288
9018717877	8139608619	2013-11-15	16:36:21	0001:35	G	VZT Intra Group
9018717877	8139608619	2013-11-15	16:49:41	0000:05	G	VZT Intra Group
9018717877	8139608619	2013-11-15	16:49:41	0000:05	G	Carried by 0288
9018717877	8139608619	2013-11-15	16:50:47	0000:43	G	Carried by 0288
9018717877	8139608619	2013-11-15	16:50:47	0000:44	G	VZT Intra Group

Attachment 13

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21



123365513924885
02/15/2014

SUBSCRIBER INFORMATION

545005692345

C/T

Financially Liable Party

Name: R COURTNEY

Credit Address: 7229 BIRCHTREE CV, GERMANTOWN, TN 38138

Customer Since: 08/02/2006

Photo ID Type:

Photo ID State:

Photo ID Number:

DOB:

SSN:

Contact Name:

Contact Home Phone: (901) 753-9988

Contact Work Phone: (901) 496-6993

Contact Home Email: CPAIGE@AIRMOTA.ORG

Contact Work Email:

Billing Party

Account Number: 545005692345

Name: R COURTNEY

Billing Address: 7229 BIRCHTREE CV, GERMANTOWN, TN 38138

Account Status: Active

Billing Cycle: 13

User Information

MSISDN: (901) 871-7877

IMSI: 310410557348010

MSISDN Active: 11/20/2009 - Current

IMEI/ESN: 013336001245979/

Name: C PAIGE

User Address: 7050 CORSICA DR, GERMANTOWN, TN 38138

Service Start Date: 11/20/2009

Dealer Info: VV VV

Payment Type: Postpaid

Contact Name:

Contact Home Phone:

Contact Work Phone:

Contact Home Email: CPAIGE@AIRMOTA.ORG

Contact Work Email:

Status Change History

Status Change Reason:

Status Change Date:

ccrt

AT&T PROPRIETARY

Page 1

The information contained here is for use by authorized person only and
is not for general distribution. DPA 55

Index 12

Attachment 14

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

Assessor of Property

Shelby County, Tennessee



[APPRAISAL](#) [REAPPRAISAL](#) [ASSESSMENT](#) [PERSONAL PROPERTY](#)

PROPERTY RECORD CARD

DETAILS FOR THIS PROPERTY

[Return to search results](#)

Property Location and Owner Information	2014 Appraisal and Assessment Information
Parcel ID: G0219L G00033	Class: RESIDENTIAL
Property Address: 7050 CORSICA DR	Land Appraisal: \$ 44,200
Municipal Jurisdiction: GERMANTOWN	Building Appraisal: \$ 164,400
Neighborhood Number: 00902A01	Total Appraisal: \$ 208,600
Tax Map Page: 152H	Total Assessment: \$ 52,150
Land Square Footage:	Greenbelt Land: \$ 0
Acres: 0.2390	Homesite Land: \$ 0
Lot Dimensions: 95 X 110	Homesite Building: \$ 0
Subdivision Name: RIVERDALE FARMS REV SEC A	Greenbelt Appraisal: \$ 0
Subdivision Lot Number: 0 33	Greenbelt Assessment: \$ 0
Plat Book and Page: 50-17	
Number of Improvements: 1	Click Here for 2013 Values
Owner Name: MELVIN RUSSELL C & SUZANNE A	View: Assessor's GIS Map
In Care Of:	View: GIS Parcel Map
Owner Address: 7050 CORSICA DR	
Owner City/State/Zip: GERMANTOWN, TN 38138 1606	

Dwelling Construction Information			
Stories:	2.0	Heat:	CENTRAL A/C AND HEAT
Exterior Walls:	BRICK	Fuel:	NOT APPLICABLE
Land Use:	- SINGLE FAMILY	Heating System:	NOT APPLICABLE
Year Built:	1973		
Total Rooms:	8	Fireplace Masonry:	1
Bedrooms:	4	Fireplace Pre-Fab:	0
Bathrooms:	2		
Half Baths:	1	Ground Floor Area:	1238
Basement Type:	NONE	Total Living Area:	2676
		Car Parking:	BRICK GARAGE

Attachment 15

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

CHEYENNE JOHNSON
Assessor of Property
 Shelby County, Tennessee



[APPRAISAL](#) [REAPPRAISAL](#) [ASSESSMENT](#) [PERSONAL PROPERTY](#)

SALES DATA FOR THIS PROPERTY

[Return to search results](#)

Parcel ID: G0219L G00033
 Property Address: 7050 CORSICA DR
 Owner Name: MELVIN RUSSELL C & SUZANNE A
 Owner Address: 7050 CORSICA DR
 Owner City/State/Zip: GERMANTOWN, TN 38138 1606

Date of Sale	Sales Price	Deed Number	Instrument Type
04/26/2006	\$209,000	06067731	WD
12/15/1995	\$156,000	FN1946	WD
04/28/1994	\$140,000	EJ2216	WD
05/27/1983	\$90,500	U30384	WD
07/29/1976	\$62,500	L44478	UN
04/24/1973	\$49,900	H72807	UN

Click [here](#) for a description of Instrument Type abbreviations

Attachment 16

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

BILL GARRETT, Davidson County
 Trans: T20120071159 DEEDUARR
 Recvd: 09/21/12 08:40 2 pgs
 Fees: 13.00 Taxes: 601.25
 20120921-0085799

STATE OF Tennessee
 COUNTY OF Davidson
 THE ACTUAL CONSIDERATION OR VALUE, WHICHEVER IS GREATER, FOR THIS TRANSFER IS \$162,500.00

Sam Hester
 Affiant
 Subscribed and sworn to before me, this 17th DAY OF September, 2012.

[Signature]
 Notary Public
 MY COMMISSION EXPIRES: 5-20-14
 (AFFIX SEAL)

R-JG-12-8842

STATE OF TENNESSEE
 DAVIDSON COUNTY
 NOTARY PUBLIC

INSTRUMENT WAS PREPARED BY
 Rudy Title & Escrow, LLC
 2012 21st Avenue South
 Nashville, TN 37212

ADDRESS (NEW OWNER(S)) AS FOLLOWS (NAME)	SEND TAX BILL TO:	MAP-PARCEL NUMBERS
Russell C. Melvin	Russell C. Melvin	
	(NAME)	
7050 Corsica Dr.	7050 Corsica Dr.	
(ADDRESS)	(ADDRESS)	
Germantown, TN 38138	Germantown, TN 38138	16900035600
(CITY) (STATE) (ZIP)	(CITY) (STATE) (ZIP)	

For and in consideration of the sum of TEN DOLLARS, cash in hand, paid by the hereinafter named Grantee(s), and other good and valuable considerations, the receipt of which is hereby acknowledged, we PHILIP E. CHAMBLEE, hereinafter called the Grantor(s), have bargained and sold, and by these presents do transfer and convey unto RUSSELL C. MELVIN AND WIFE, SUZANNE A. MELVIN, hereinafter called the Grantee(s), their heirs and assigns, that certain tract or parcel of land in DAVIDSON COUNTY, STATE OF TENNESSEE, described as follows, to wit:

BEING A TRACT OF LAND IN THE 35TH COUNCILMANIC DISTRICT OF DAVIDSON COUNTY, TENNESSEE, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

TRACT 2:

BEGINNING AT AN IRON ROD SET IN THE SOUTHEAST MARGIN OF HESTER BEASLEY ROAD AT A DISTANCE OF 25 FEET FROM THE CENTER OF SAID ROAD, SAID POINT BEING A CORNER OF TRACT 1, THENCE LEAVING THE SOUTHEAST MARGIN OF HESTER BEASLEY ROAD WITH A BOUNDARY LINE OF TRACT 1 ON A NEWLY ESTABLISHED LINE SOUTH 59 DEG. 53 MIN. 14 SEC. EAST, 855.53 FEET TO AN IRON ROD SET IN A NORTHERN BOUNDARY LINE OF TRACT 3; THENCE ALONG BOUNDARY LINES OF TRACT 3 ON NEWLY ESTABLISHED LINES TO POINTS AS FOLLOWS: SOUTH 82 DEG. 00 MIN. 50 SEC. WEST, 824.59 FEET TO AN IRON ROD SET; NORTH 42 DEG. 25 MIN. 42 SEC. WEST, 435.13 FEET TO AN IRON ROD SET IN THE SOUTHEAST MARGIN OF HESTER BEASLEY ROAD; THENCE ALONG THE SOUTHEAST MARGIN OF HESTER BEASLEY ROAD TO POINTS AS FOLLOWS: NORTH 49 DEG. 17 MIN. 53 SEC. EAST, 81.33 FEET; NORTH 43 DEG. 30 MIN. 22 SEC. EAST, 109.81 FEET; NORTH 29 DEG. 14 MIN. 15 SEC. EAST, 71.21 FEET TO THE POINT OF BEGINNING, CONTAINING 5.02 ACRES, MORE OR LESS.

BEING THE SAME PROPERTY CONVEYED TO PHILIP E. CHAMBLEE BY DEED FROM JAMES W. MORRIS AND MARGARET M. CAMPBELL, AS CO-TRUSTEES OF THE MARY B. JOHNSON REVOCABLE LIVING TRUST AGREEMENT DATED SEPTEMBER 14, 2007, OF RECORD AT INSTRUMENT NO. 20101230-0104037, REGISTER'S OFFICE FOR DAVIDSON COUNTY, TENNESSEE, DATED DECEMBER 20, 2010.

THIS CONVEYANCE IS SUBJECT TO A) 2012 PROPERTY TAXES, WHICH HAVE BEEN PRORATED AND ASSUMED BY THE GRANTEE (S) HEREIN; B) ANY AND ALL EXISTING EASEMENTS AND RESTRICTIONS AS SHOWN OF RECORD AND/OR NOT STATED HEREIN.

unimproved ()
 This is improved (X) property, known as 8942 Hester Beasley Road, Nashville, Tennessee 37221
 (House Number) (Street) (PO Address) (City or Town) (Postal ZIP)

Attachment 17

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

Submitted On	Submitted By IP	First Name	M. I.	Last Name	Nickname
1/5/11 5:42	24.41.79.162	Russell	C.	Melvin	Russ

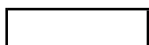
Email Address	Confirm Email Address	Street Address	Address Line 2
russell@russellmelvin.com	russell@russellmelvin.com	7050 Corsica Drive	

City	State	Zip Code	Home Telephone	Cell Phone	Employee #	Base
Germantown	TN	38138	(901) 209-9359		448171	MEM

Equip	Seat	Date of Birth	Volunteer
320	B - First Officer	11/10/67	YES

List any special skills or experience you may have.

Chief of Air Safety (USAF & ALPA MEM), Communications (Professional Writer and Publicist)



Attachment 18

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

CA Kingsley Roberts – MEC Chairman
CA Greg Rizzuto – MEC Executive Administrator
Bren Fries – MEC Treasurer
CA Mike Hanson – MEC Strategic Planning Chairman
Logan Davis – MEC DPN Chairman
Russ Melvin – MEC Government Affairs
CA Steve Rose – P2P Chairman

and LEC reps on hand to take your feedback and answer any questions you may have. Food and refreshments will be provided.

The Delta Pilot Network has been running PUB events around the system throughout the summer. These events are an easy way to participate in our union, and have been well-received due to the casual format.

We hope to see you there!

Captain Bill Bartels	LEC Chairman/CA REP	Bill.Bartels@alpa.org	(734) 834-5634
Rich Wheeler	LEC Vice Chairman/FO REP	Richard.Wheeler@alpa.org	(954) 494-5086
Captain Tom Bell	Secretary/Treasurer	Tom.Bell@alpa.org	(414) 520-6049

[Air Line Pilots Association, International](http://www.alpa.org)
www.alpa.org

If you wish to unsubscribe, please [click here](#) to login and update your Standard Mailings/E-Mail Distribution Lists preferences.

Attachment 19

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

COMMITTEE	FIRST NAME	LAST NAME		COMMITTEE	FIRST NAME	LAST NAME
Central Air Safety	Stephen	Mcintyre		FERF	Micheal	Davis
Scheduling	Bill	McLaren		FERF	Richard	Farren
DPN	Michael	McMahon		FERF	Kimberly	Gibson
P2P	Mike	McMahon		FERF	David	Ireland
Hotel	Jim	McNerney		FERF	Frederick	Jacobsen
DPAC	Scott	Meacham		FERF	Luis	Perez
Government Affairs	Russell	Melvin		FERF	Abbott (Chip)	Taylor
DPAC	Mike	Menah		FERF	Jeanel	Wehner
Central Air Safety	Kimberly	Mercer		Government Affairs	Dino	Atsalis
Central Air Safety	James	Millegan		Government Affairs	Nate	Brown
PAN	Pat	Millegan		Government Affairs	Judson	Crane
DPAC	Evan	Miller		Government Affairs	Eric	Hall
DPAC	Ken	Mills		Government Affairs	Tim	Heiple
DPN	Dave	Milner		Government Affairs	Russell	Melvin
PAN	Steve	Mishek		Government Affairs	Kevin	O'Mahoney
P2P	Dave	Moeder		Government Affairs	Mike	Pinho
Central Air Safety	Robert	Mongillo		Government Affairs	Mike	Quigley
DPAC	Scott	Monjeau		Government Affairs	Doug	Ralph
Central Air Safety	Raymond	Montalbano		Government Affairs	Dave	Short
System Board of Adjustment	Monty	Montgomery		Government Affairs	Pete	Strople
P2P	Gary	Moore		Government Affairs	John	White
Central Air Safety	James	Moore		Government Affairs	Jenny	Winter
DPN	Mark	Moore		Hotel	Malcolm	Adam
P2P	Mark	Moore		Hotel	Lynn	Austin
DPAC	Scott	Moore		Hotel	Billy	Call
Merger	John	Morgado		Hotel	Tom	Facer
System Board of Adjustment	John	Morgado		Hotel	Alan	Hicks
Contract Administration	Kevin	Morris		Hotel	Jeff	Hill
Central Air Safety	William	Mostellar		Hotel	Kathleen	Loftus
Scheduling	William	Mostellar		Hotel	Jim	McNerney
DPAC	Warren	Mowry		Hotel	Joe	Painter
Training	Ed	Mueller		Hotel	Dan	Piraino
DPN	Bob	Nadelberg		Hotel	Jack	Pollard

Attachment 20

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

Air Line Pilots Association
ALPA Flight Pay Loss System
4th Qtr FPL Report
2/28/14 0:00

Name	Project	Trip Dates	Hours
AARON, ARTHUR	MEC Meetings	10/18/2013 - 10/20/2013	17.91
	MEC Meetings	11/11/2013 - 11/16/2013	31.5
	MEC Meetings	12/8/2013 - 12/11/2013	20
	MEC Administration	12/16/2013 - 12/16/2013	5
ABARE, NORMAN	IAAC	10/1/2013 - 10/1/2013	17.05
	DPN	10/2/2013 - 10/4/2013	18.01
	DPN	10/23/2013 - 10/24/2013	12.18
	IAAC	10/25/2013 - 10/27/2013	17
	MEC Meetings	11/12/2013 - 11/14/2013	14.08
	IAAC	12/5/2013 - 12/6/2013	10.53
	IAAC	12/7/2013 - 12/10/2013	20.33
	IAAC	12/13/2013 - 12/16/2013	20.33
ADAMS, JOHN	Communications	10/1/2013 - 10/31/2013	87
	Communications	11/1/2013 - 11/30/2013	64.25
	Communications	11/7/2013 - 11/7/2013	3.25
	Communications	12/1/2013 - 12/31/2013	87
ADLER, DAVID	NWA - DRC	10/12/2013 - 10/14/2013	18.11
ANDERSON, SCOTT	DPN	10/29/2013 - 11/1/2013	20
ATSALIS, KONSTANTINOS	Gov't Affairs	10/1/2013 - 10/1/2013	10.43
	Gov't Affairs	11/4/2013 - 11/7/2013	20
	MEC Meetings	11/11/2013 - 11/15/2013	25
	Gov't Affairs	11/18/2013 - 11/21/2013	20
	Gov't Affairs	11/28/2013 - 11/30/2013	11.25
	Employee Stock Ownership	12/10/2013 - 12/15/2013	33.75
BAILEY-SCHMIDT, SUSAN	ASAP	10/8/2013 - 10/10/2013	15.81
	ASAP	10/29/2013 - 10/31/2013	14.43
	ASAP	11/21/2013 - 11/23/2013	15.75
	ASAP	12/17/2013 - 12/19/2013	15.83
BALDWIN, WILLIAM	ASAP	10/8/2013 - 10/8/2013	5.25
	ASAP	10/9/2013 - 10/10/2013	1.45
	ASAP	11/25/2013 - 11/27/2013	17.48
	ASAP	12/13/2013 - 12/15/2013	15
BARTELS, WILLIAM	MEC Meetings	10/1/2013 - 10/1/2013	6.5
	Lounge	10/18/2013 - 10/20/2013	18.133
	MEC Meetings	10/25/2013 - 10/26/2013	10.5
	MEC Meetings	11/11/2013 - 11/16/2013	31.5
	MEC Meetings	12/1/2013 - 12/1/2013	3.75
	Lounge	12/8/2013 - 12/8/2013	5
	MEC Meetings	12/9/2013 - 12/10/2013	10

	Contract Administration	12/1/2013 - 12/31/2013	53
LINDBERG, CARL	FOQA	10/10/2013 - 10/13/2013	19.43
	FOQA	10/16/2013 - 10/19/2013	21.26
	FOQA	11/17/2013 - 11/19/2013	16
	FOQA	12/18/2013 - 12/21/2013	19.58
LUCE, ANDREW	MEC Training	10/23/2013 - 10/25/2013	16.65
MAKONNEN, IYOB	Communications	10/6/2013 - 10/8/2013	15
	Communications	11/9/2013 - 11/11/2013	17.9
MANILLA, ANDREW	Lounge	10/14/2013 - 10/16/2013	15
	Duty Officer	10/20/2013 - 10/25/2013	30
	Lounge	11/5/2013 - 11/5/2013	5
	MEC Meetings	11/11/2013 - 11/16/2013	31.5
	MEC Meetings	12/8/2013 - 12/10/2013	15
	Lounge	12/12/2013 - 12/12/2013	5
MARBLE, DAVID	DPN	10/3/2013 - 10/9/2013	35
	P2P	12/10/2013 - 12/13/2013	20
	P2P	12/17/2013 - 12/20/2013	20
	P2P	12/21/2013 - 12/22/2013	10
MARINO, DAVID	MEC Meetings	11/14/2013 - 11/16/2013	13.5
	MEC Meetings	12/8/2013 - 12/10/2013	13.5
MASON, SAMUEL	MEC Administration	10/3/2013 - 10/4/2013	10
	MEC Administration	10/21/2013 - 10/22/2013	10
	MEC Code Share	11/4/2013 - 11/5/2013	10.65
	DPN	11/7/2013 - 11/9/2013	17.48
	MEC Meetings	11/13/2013 - 11/17/2013	22.55
MAYER, STEPHEN	Lounge	10/1/2013 - 10/1/2013	3.75
	Lounge	10/13/2013 - 10/17/2013	25
	MEC Meetings	11/11/2013 - 11/16/2013	31.5
	MEC Meetings	12/1/2013 - 12/1/2013	3.75
	MEC Administration	12/2/2013 - 12/3/2013	10
	MEC Meetings	12/9/2013 - 12/10/2013	10
	Lounge	12/11/2013 - 12/11/2013	5
	Lounge	12/20/2013 - 12/22/2013	15
MCCOLLUM, ROGER	P2P	10/11/2013 - 10/14/2013	26.11
MCDONALD, REED	Merger	11/30/2013 - 11/30/2013	3.25
	Merger	12/27/2013 - 12/27/2013	3.25
MCLAREN, WILLIAM	P2P	11/1/2013 - 11/1/2013	14.63
	MEC Meetings	11/11/2013 - 11/16/2013	31.5
MCNERNEY, J	MEC Hotel	10/29/2013 - 10/31/2013	29.83
	MEC Hotel	11/10/2013 - 11/12/2013	23.16
MELVIN, RUSSELL	DPN	10/7/2013 - 10/10/2013	20
	DPN	10/12/2013 - 10/12/2013	5
	RA - DAL RINS	10/21/2013 - 10/23/2013	15
	Communications	10/29/2013 - 10/29/2013	5
	Communications	10/30/2013 - 11/1/2013	15

	P2P	11/6/2013 - 11/8/2013	15
	Communications	11/19/2013 - 11/19/2013	5
	P2P	11/20/2013 - 11/20/2013	5
	P2P	11/21/2013 - 11/21/2013	5
	P2P	11/22/2013 - 11/22/2013	5
	Gov't Affairs	12/4/2013 - 12/5/2013	10
	Gov't Affairs	12/11/2013 - 12/11/2013	5
	Gov't Affairs	12/12/2013 - 12/13/2013	10
MILLER, EVAN	Hims	10/11/2013 - 10/11/2013	3.733
MONJEAU, SCOTT	Hims	10/1/2013 - 10/2/2013	10.5
	Hims	10/1/2013 - 10/1/2013	0.18
	Hims	10/25/2013 - 10/26/2013	10.5
	Hims	12/19/2013 - 12/20/2013	10.5
MORGADO, JOHN	Merger	11/6/2013 - 11/8/2013	17.18
	MEC Meetings	11/12/2013 - 11/15/2013	21.9
MORRELL, RONALD	MEC Meetings	10/16/2013 - 10/18/2013	15.13
	MEC Meetings	11/11/2013 - 11/16/2013	31.5
	MEC Meetings	12/8/2013 - 12/11/2013	15
	Communications	12/12/2013 - 12/14/2013	10
MORRIS, KEVIN	Contract Administration	10/1/2013 - 10/31/2013	87
	Contract Administration	11/1/2013 - 11/30/2013	87
	Contract Administration	12/1/2013 - 12/31/2013	87
MOWRY, WARREN	Hims	12/30/2013 - 12/30/2013	5.25
MUELLER, EDMUND	NWA - DRC	10/15/2013 - 10/15/2013	5
	NWA - DRC	10/30/2013 - 10/30/2013	5
	MEC Training	11/14/2013 - 11/14/2013	5.25
	Duty Officer	12/1/2013 - 12/1/2013	3.75
	MEC Training	12/15/2013 - 12/15/2013	5
	MEC Training	12/16/2013 - 12/19/2013	20
	NWA - DRC	12/28/2013 - 12/28/2013	5
NESTOR, DAVID	MEC Meetings	10/16/2013 - 10/16/2013	5
	Lounge	10/17/2013 - 10/20/2013	20
	MEC Meetings	11/11/2013 - 11/16/2013	31.5
	Duty Officer	12/1/2013 - 12/2/2013	10.57
	Duty Officer	12/4/2013 - 12/6/2013	18.8
	MEC Meetings	12/8/2013 - 12/10/2013	13.5
NEVINS, CHRISTOPHER	Negotiations	10/1/2013 - 10/31/2013	85.5
	Negotiations	11/1/2013 - 11/30/2013	92
	Negotiations	12/1/2013 - 12/31/2013	69.25
NORDHAUSEN, WILLIAM	MEC Administration	11/17/2013 - 11/19/2013	14.98
O MALLEY, TIMOTHY	SCFSS	10/13/2013 - 10/16/2013	21.55
	Executive Board	10/21/2013 - 10/24/2013	22.45
	SCFSS	11/19/2013 - 11/21/2013	18.35
OBRIEN, JOHN	MEC Hotel	11/21/2013 - 11/23/2013	15.01
	MEC Hotel	12/1/2013 - 12/4/2013	18

Attachment 21

To Declaration of Nicholas Paul Granath

In support of

Plaintiff's

Sealed Motion

To Amend Complaint

To Add A Named Defendant,

Pursuant To Rules 15 & 21

Pilot Schedule

PILOT SCHEDULE

14/04/23 16:25:56

FOR

LOCKER: -

NAME: MELVIN, RUSSELL C

EMP NBR: 0448171

LOT: 0513 ATL 320 B 01NOV13 / 30NOV13 SECND-CAT:

CURRENT RAW VALUE: 151

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02S		RES	**	ALPA														02S
03S		RES	**															03S
04M		RES	XX															04M
05T		RES	XX	ALPA														05T
06W		RES		ALPA														06W
07T		RES		ALPA														07T
08F		RES		ALPA														08F
09S		RES	XX	ALPA														09S
10S		RES		QVAC			*											10S
11M		RES		QVAC			*											11M
12T		RES		QVAC			*											12T
13W		RES		QVAC			*											13W
14T		RES		QVAC			*											14T
15F		RES		QVAC			*											15F
16S		RES		QVAC			*											16S
17S		RES	**															17S
18M		RES	**															18M
19T		RES		ALPA														19T
20W		RES		ALPA														20W
21T		RES		ALPA														21T
22F		RES		ALPA														22F
23S		RES	**															23S
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25M		RES	XX	OKNF														25M
26T		RES	XX															26T
27W		RES			.0814						1654							27W
28T		RES			----													28T
29F		RES			----													29F
30S		RES			----												1637	30S

REMARKS:

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NAME: MELVIN, RUSSELL C

EMP NBR: 0448171 BEGIN DATE: 01NOV13

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